

**REMARKS**

Reconsideration of the present application, as amended herein, is respectfully requested.

Claims 1 – 26 are currently pending in the present application. Claims 1 – 15 and 22 – 26 have been indicated as allowable, for which the Applicant would like to thank the Examiner. Applicant additionally gratefully acknowledges the allowability of Claim 21, which has been objected to, but indicated as allowable if rewritten to include all of the limitations of the base claim and any intervening claims. Claims 16 – 20 presently stand rejected. Claim 16 has been amended herein to better clarify the invention of that claim.

**Claim Rejections – 35 U.S.C. §102**

More particularly, claims 16 – 20 have been rejected under 35 U.S.C. 102(b) as allegedly being anticipated by United States Patent No. 6,325,555 to Zawodny et al. Applicant respectfully traverses the above rejections.

Independent claim 16, as amended herein, relates to a particularly configured winding tool for use with a loyalty camera in a camera loyalty system. Among others, claim 16 recites the limitation of

“a plurality of individual, freestanding winding prongs extending perpendicular from said lower surface and arranged to engage a corresponding plurality of individual mating holes in the loyalty camera;”

In the Office Action, tabs 65 of the Zawodny reference, described in Col. 5, lines. 11-23, are pointed to as showing Applicant’s particularly claimed plurality of winding prongs.

Applicant respectfully disagrees. More specifically, the cited portion of Zawodny is as follows::

The tool 60 also includes a generally circular-shaped rim 64, having at least one inwardly disposed tab 65, extending out from its bottom face 66. The rim 64 and tabs 65 are structured to mate with a corresponding shaped structure disposed on the outer end 33 of the outer end zone 32 of the take-up spool to facilitate the pre-winding of the unexposed film from the film cartridge to the take-up spool. It should be appreciated that other means known in the art for removably securing the tool 60 to the outer end zone 32 of the take-up spool may, alternatively, be employed. Additionally, indicia may be provided on the top face 67 of the tool 60 to instruct the user of the proper direction of rotation to pre-wind the film.

Claim 16 of the present application has been amended to clarify that the prongs are individual, freestanding prongs extending perpendicularly from the bottom face of the tool. Contrary to Applicant's invention, Zawodny describes a generally circular shaped rim 64 and at least one inwardly disposed tab 65, extending from the bottom face 66 of the Zawodny tool. Instead of freestanding from the bottom of the tool, and separate from each other, the tabs 65 of Zawodny are part of the circular shaped rim 64 in such a way that the circular shaped ring is part of the rewinding structure. This is emphasized by Col. 5, ll. 13 – 17, which states, in part, that “[t]he rim 64 and tabs 65 are structured to mate with a corresponding shaped structure disposed on the outer end 33 . . . .” See also, Figs. 6 and 7 of Zawodny. Contrary to Zawodny, the only unitary structure of which the individual prongs are a part is the tool, itself. As such, Zawodny fails to teach or suggest the claimed “individual, freestanding winding prongs”

Further, claim 16, as presently amended, requires that the prongs be particularly configured “a corresponding plurality of individual mating holes.” Zawodny also fails to teach this feature of claim 16. Rather, Zawodny teaches that the unitary rim and tabs projection “are structured to mate with a corresponding shaped structure.” As shown in Figs. 1 and 8 of Zawodny, the unitary rim and tabs projection mates with a unitary outer end 33 with indentations, not holes, molded as part of the shape of the unitary outer end 33. As such, Zawodny fails to teach or suggest the claimed prongs that are “arranged to engage a corresponding plurality of individual mating holes”. Zawodny does not teach or suggest a plurality of individual mating holes.

For the foregoing reasons, as well as others, it is believed that the currently pending independent claim 16, and claims 17 – 21 depending therefrom, are patentable over the cited Zawodny reference.

In view of the foregoing, it is believed that all claims of the instant application are presently in condition for immediate allowance, and such action is respectfully requested.

Respectfully submitted,

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